

## C.15 Conclusion

### C.15.1 NEPA Environmentally Preferred Alternative

This section utilizes the detailed discussions of the existing environmental conditions and the analysis of the environmental consequences of the alternatives in Sections C.2 through C.13 of this Draft EIS/EIR, as well as the technical studies and other material in the Appendices.

In accordance with NEPA requirements, the “preferred alternative” is a preliminary indication of the federal responsible official’s preference of action, which is chosen from among the proposed action and alternatives. The preferred alternative may be selected for a variety of reasons (such as the priorities of the particular lead agency) in addition to the environmental considerations discussed in a Draft EIS. In accordance with NEPA (40 CFR Section 1502.14(e)), the Forest Service will consider the conclusions of the Draft EIS as well as public and agency comments in order to identify its preferred alternative in the Final EIS.

In addition to the preferred alternative, the federal lead agency is also required to identify an “environmentally preferable alternative” in the Record of Decision for the EIS (40 CFR Section 1505.2(b)). In contrast to the preferred alternative, the environmentally preferable alternative is the alternative that will promote the purposes expressed in NEPA’s Section 101. Typically, this is the alternative that would cause the least environmental damage as well as preserve natural resources related to cultural and historical values. Therefore, the preferred alternative identified in a Final EIS may not be the same as the environmentally preferable alternative identified in the ROD. The NEPA environmentally preferable alternative is subject to all mitigation measures applicable to NFS lands identified in Section C (Affected Environment and Environmental Consequences).

**Proposed Action.** The proposed action was developed to meet the project objectives while avoiding biological resource impacts that were identified in the 1991/1992 Littlerock Dam and Reservoir Restoration Project EIS/EIR, for which sediment excavation was proposed but never implemented due to the presence of the federally-endangered arroyo toad at the Reservoir. The proposed action includes the construction of a grade control structure to preserve arroyo toad habitat by preventing sediment loss and headcutting upstream of Rocky Point, where critical arroyo toad habitat has been identified. The proposed action would also incorporate SPCs to minimize and/or avoid the impacts identified in Sections C.2 through C.13 (refer to Appendix A (Standard Project Commitments) for a complete list of SPCs). Resources that would be adversely impacted by the proposed action during temporary annual activities include air quality (i.e., daily PM10 emissions), traffic (i.e., number of truck trips and associated traffic delays), and recreation and land use (i.e., closure of recreation facilities and nuisance impacts to adjacent residences) (see Table C.14-1). These impacts would similarly occur under Alternative 1, although Alternative 1 includes a modification to the sediment removal schedule to lessen the severity of temporary air quality, traffic, and noise impacts (see Alternative 1 discussion below). Compared to the proposed action, the No Action/No Project Alternative would not result in short-term impacts to air quality, traffic, recreation, and land use. However, the No Action/No Project Alternative could lead to the eventual removal of the Dam, which would likely result in a more intense construction effort and greater impacts than the proposed action or Alternative 1 (see No Action/No Project discussion below).

**No Action/No Project Alternative.** The No Action/No Project Alternative would not involve sediment removal activities, avoiding the resource impacts identified for the proposed action and Alternative 1 over the short-term. However, sediment would continue to accumulate upstream of Littlerock Dam at the annual average rate of 38,000 cubic yards per year, reducing the capacity of the Reservoir by

approximately 23.6 acre-feet annually. As the Reservoir becomes filled with sediment against the existing Dam, a future project may be required to remove the existing Dam for safety reasons and construct new downstream levee improvements. Such a project is expected to involve sediment removal in quantities greater than or similar to the proposed action or Alternative 1. Such a project would not occur slowly on an annual basis (such as the proposed action and Alternative 1), requiring a more intense construction effort and likely resulting in greater impacts than the other alternatives over the long-term (see Table C.14-1).

**Alternative 1.** The Reduced Sediment Removal Intensity Alternative (Alternative 1) was expressly developed as a modification to the proposed action's annual sediment removal schedule in order to reduce the intensity of daily construction activities by extending the annual sediment removal period. By doing this, it would:

- Reduce daily PM10 emissions during excavation and construction;
- Reduce the number of daily truck trips on public roadways; and
- Reduce the frequency of periodic truck trip noise to receptors along the haul routes and allow for a more flexible construction effort (e.g., less rigid schedule, use of smaller haul trucks) to potentially reduce periodic vibration from loaded haul trucks travelling on public roadways.

Compared with the proposed action and the No Action/No Project Alternative, Alternative 1 would extend the duration of impacts to wildlife species from an extended annual construction schedule that could overlap with nesting bird periods. However, as discussed in Section C.3 (Biological Resources), the adverse effects under Alternative 1 would be reduced and/or avoided through the incorporation and implementation of SPCs. Alternative 1 would also extend the annual closure period of the Reservoir and surrounding recreation facilities during a portion of the peak summer period, which would result in a slightly greater recreational impact when compared to the other alternatives. However, as discussed in Section C.9 (Recreation and Land Use), recreational opportunities at the Reservoir have not been consistently available to the public during the additional weeks proposed for closure under Alternative 1, and currently the Reservoir is closed to public access. In addition, during drought conditions (such as the one currently occurring throughout the State), PWD is allowed to divert water from the Reservoir below the minimum pool level starting in July. Ongoing drought conditions may prevent any use of the Reservoir for water-based recreational activities during the additional weeks proposed for closure under Alternative 1. The adverse effects to recreation from slightly extending public closure of the Reservoir during the annual sediment removal period that are specific to Alternative 1 were considered less important than the reduction of the air quality, traffic, and noise impacts that are associated with this alternative.

Based on the analysis in this Draft EIS/EIR the environmentally preferable alternative would be the Reduced Sediment Removal Intensity Alternative (Alternative 1). In accordance with NEPA (40 CFR Section 1502.14(e)), the Forest Service will identify its preferred alternative (likely to be the same as the environmentally preferred alternative) in the Final EIS/EIR.

### **C.15.2 CEQA Environmentally Superior Alternative**

In accordance with CEQA requirements, an "environmentally superior alternative" must be identified among the alternatives analyzed in an EIR or EIR/EIS. The environmentally superior alternative is the alternative found to have an overall environmental advantage compared to the other alternatives based on the impact analysis in the EIR. If the environmentally superior alternative is the No Project

alternative, State CEQA Guidelines Section 15126.6(e)(2) requires the EIR to identify an environmentally superior alternative from among the other alternatives.

In the case of the Littlerock Reservoir Sediment Removal Project, the No Action/No Project Alternative may result in the need for a future project requiring the removal of the existing Dam. Such a project would require sediment removal in quantities greater than or similar to the proposed Project. In addition, such a project would require a more intense construction effort resulting from Dam removal activities that may result in greater impacts than the proposed Project (see Table C.14-1). Due to the potential scale of such a project, the No Action/No Project Alternative could result in as many as 17 significant and unavoidable impacts (Class I), and 26 significant impacts (Class II) that can be reduced to a less than significant level through feasible mitigation (see Table ES-2).

The Reduced Sediment Removal Intensity Alternative (Alternative 1) was expressly developed as a modification to the proposed Project's annual sediment removal schedule in order to reduce the intensity of daily construction activities by extending the annual sediment removal period. By doing this, it would reduce the severity of impacts associated with air quality, traffic, and noise. Alternative 1 is feasible and would reasonably achieve the objectives of the proposed Project. Alternative 1 would be environmentally superior to the proposed Project because it would:

- Reduce daily PM10 emissions during excavation and construction;
- Reduce the number of daily truck trips on public roadways; and
- Reduce the frequency of periodic truck trip noise to receptors along the haul routes and allow for a more flexible construction effort (e.g., less rigid schedule, use of smaller haul trucks) to potentially reduce periodic vibration from loaded haul trucks travelling on public roadways.

In selecting the environmentally superior alternative, consideration was given to resources that may be affected by greater impacts under Alternative 1 when compared to the proposed Project, specifically biological resources and recreation. Biological resource impacts would include adverse effects to species from an extended annual construction period that could overlap with nesting periods and/or would extend the duration of impacts within certain habitats. However, as discussed in Section C.3 (Biological Resources), these adverse effects under Alternative 1 would be reduced and/or avoided through the incorporation of SPCs. Overall impacts to biological resources would be less than significant (Class III) under Alternative 1.

Alternative 1 would result in a slightly greater recreational impact when compared to the proposed Project, as it would extend the annual closure period of the Reservoir and surrounding recreation facilities during the peak summer period. However, as discussed in Section C.9 (Recreation and Land Use), recreational opportunities at the Reservoir have not been consistently available to the public during the additional weeks proposed for closure under Alternative 1, and currently the Reservoir is closed to public access. In addition, during drought conditions (such as the one currently occurring throughout the State), PWD is allowed to divert water from the Reservoir below the minimum pool level starting in July. Ongoing drought conditions may prevent any use of the Reservoir for water-based recreational activities during the additional weeks proposed for closure under Alternative 1. As such, the adverse impacts to recreation from slightly extending public closure of the Reservoir during the annual sediment removal period that are specific to Alternative 1 were considered less important than the reduction of the air quality, traffic, and noise impacts.

PWD has identified the Reduced Sediment Removal Intensity Alternative (Alternative 1) as the CEQA Environmentally Superior Alternative.